March 8, 2011

Ms. Deborah Jordan
Director, Air Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: Minor Revision to Major Facility Review Permit for Facility # A0016 pursuant to Applications 22024 and 22568

Dear Ms. Jordan:

ALAMEDA COUNTY
Tom Bates
(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

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**CONTRA COSTA COUNTY** 

John Gioia (Vice-Chair) David Hudson Mark Ross Gayle B. Uilkema

MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY

Eric Mar Edwin M. Lee

SAN MATEO COUNTY Carol Klatt Carole Groom

SANTA CLARA COUNTY

Susan Garner Ash Kalra (Secretary) Liz Kniss Ken Yeager

SOLANO COUNTY James Spering

Sonoma County
Shirlee Zane

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for ConocoPhillips – San Francisco Refinery and is submitting the permit to EPA for review.

The purpose of this minor revision is to include an Alternate Operating Scenario for S448 Internal Floating Roof Tank (Tank 1007) and to remove BAAQMD Condition 23843 for S506.

The alternative operating scenario for S448 will allow the tank to be exempt from BAAQMD Regulation 8, Rule 5, Storage of Organic Liquids, and NSPS 40 CFR 60, Subpart Kb, Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, when the tank stores liquids with a vapor pressure less than 0.5 psia. Each time that the tank resumes operation as a tank that is subject to the standards, the owner/operator will perform all required inspections. Also, the owner/operator must record the status of the tank in a contemporaneous log when switching service.

BAAQMD Condition 23843 limits the vapor pressure of the liquid in S506. Since the tank has a natural gas blanket, pressure monitoring system, and is abated by A7, Vapor Recovery System, the limit is not necessary. The condition will be deleted to allow the owner/operator to store liquids with higher vapor pressures in the tank.

This revision is minor pursuant to BAAQMD Regulation 2-6-215 and will be effective immediately. The permit will be formally issued after EPA review. This revision is not subject to public comment and therefore, requires no public notice.

Jack P. Broadbent EXECUTIVE OFFICER/APCO The proposed Major Facility Review Permit and the statement of basis report can be viewed on the BAAQMD website at: <a href="http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx">http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx</a>. We will also send the documents to you via the Electronic Permit Submittal System. If you have any questions on this matter, please call Dennis Jang, Senior Air Quality Engineer, at (415) 749-4707.

Sincerely,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JPB:BFB:kht

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